

EXHIBIT 11

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Sean Carter, Esq.
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103

April 13, 2016

RE: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (FM)

Dear Sean,

I am writing to set forth a comprehensive list of Dubai Islamic Bank's ("DIB") discovery obligations as a consequence of Judge Maas' orders during the hearing on March 22, 2016 regarding your two motions to compel (Dkts. 2973 & 2974). See Tr. of Record, 03 MDL 1570 (Mar. 22, 2016) (hereinafter, "Tr.").

1. 152 Taliban Related Names

As ordered by Judge Maas (Tr. at 59), please find enclosed an unredacted version of DIB_003467-003491, which contains 152 names of alleged "Individuals/entities belonging to/or associated with the Taliban." DIB_003467. We are producing the unredacted document in .pdf format with the bates stamp range DIB_003558 to DIB_003582. We are producing it in response to Plaintiffs' First Set of Requests for Production of Documents to Defendant DIB.

2. Additional Search Terms

Pursuant to Judge Maas' order, you may provide us with a list of "not more than 500 names" that consists of the following four categories of names:

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- (1) “[t]he 261 ... search terms that were agreed upon by the plaintiffs and the defendants” that were included at Dkt. 3057, Ex. 4 at 3-9;
- (2) “the 152 alleged Taliban accounts” listed in the document that the Court ordered DIB to produce in unredacted form (attached hereto as DIB_003558 to DIB_003582);
- (3) “[t]he eight ... actual accounts found and produced to the plaintiff[s]” by DIB in its prior productions; and
- (4) “accounts ... that will relate to the embassy bombings.”

Tr. at 58, 51, 55.

The list attached to this letter as Appendix A is our attempt to compile the search terms for categories 1, 2, and 3 listed above, which Judge Maas referred to as the “421 or so accounts or names.” Tr. at 55. For category 3, we have tried to add the names for the eight accounts that DIB has already produced as they are spelled in your motion to compel and any aliases that you provided for those names in your motion. Dkt. 2973 at 5-11. In addition, we attempted to remove any duplicate names that existed on this list as a result of assembling search terms covering categories 1, 2, and 3. As a result, the total number of search terms in Appendix A is 422.

Judge Maas has allowed you to supplement this list up to “not more than 500 names” in total, including with names that fall into category 4. Tr. at 58. Please let us know if you have any additions, modifications, or alternative search terms to be added to this list of “not more than 500 names” to be searched.

We will then use this final list of “not more than 500 names” as search terms to be run against DIB’s legacy bank account database that tracked accounts during the period of 1992 through 2004. As we summarized to the Court at the hearing:

So, plaintiffs will provide us a list with 500 names, we will search it using the same methodology that we searched the 261 names, and if there are any accounts for any of those individuals, we will produce the first three items that I talked about out of four items that we have[:] account opening documentation, complete account statements, and any electronic transaction data that exists in our primary legacy account record keeping system.

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Tr. at 59. In short, DIB will “search for exact matches on the search term in the full name accountholder field in DIB’s electronic account record keeping system,” Dkt. 3057, Ex. 3 at 3-4, and produce the three types of documents set forth in the block quote above from January 1, 2002 “through 12/31/2004.” Tr. at 60.

DIB would like to move forward in complying with the Court’s March 22, 2016 orders regarding additional search terms. Accordingly, please provide us with a revised list of “not more than 500 names” to be searched by *April 29, 2016*.

3. Electronic Transaction Records

Consistent with Judge Maas’ orders, DIB will produce “any electronic transaction data that exists in our primary legacy account record keeping system” listed on account statements DIB has already produced to plaintiffs. Tr. at 59. In addition, DIB will produce the corresponding electronic transaction data for any additional account statements produced as a result of the additional search terms as set forth in the prior section.

4. Paper Transaction Records

Following DIB’s completion of the production of account statements and electronic transaction data, we are willing to meet and confer about the production of additional paper transaction records in a manner consistent with Judge Maas’ rulings on March 22, 2016 and our prior exchanges and correspondence on this topic. *See, e.g.*, Tr. at 57.

5. Documents Related to the 1998 U.S. Embassy Bombings

As required by the Court, DIB will search for documents regarding “investigations or other responses that the bank internally may have had in terms of checking whether it had troublesome accounts or relationships” as a result of the 1998 U.S. Embassy bombings in Kenya and Tanzania. Tr. at 63.

6. Fatwa and Sharia Supervisory Board Related Documents

Lastly, as ordered by Judge Maas, DIB will produce to plaintiffs “all Sharia Board members’ names and tenures” during the relevant time period. Dkt. 3057 at 18. Following plaintiffs’ review of that list, plaintiffs “may identify specific individuals who they have reason to believe, perhaps in their individual capacity have either individually or together with others, issued Fatwahs which are of interest.” Tr. at 61. After plaintiffs identify such individuals, DIB

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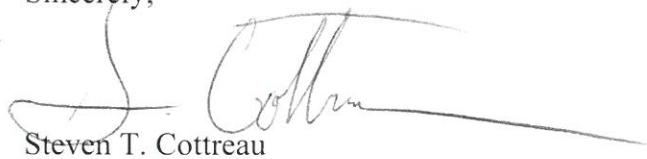
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will then search records within its possession, custody, or control for Fatwas that contain or are “related to violent pronouncements.” *Id.*

* * *

In a manner consistent with the Court’s orders on March 22, 2016, plaintiffs’ requests for production, and DIB’s objections and responses to those requests (unless specifically overruled by the Court), DIB will make to plaintiffs a rolling production of the documents set forth in this letter.

Sincerely,



Steven T. Cottreau

Enclosure

cc: Alan Kabat

Appendix A

April 13, 2016

1 A. Kabir
2 A. Wahed Shafiq
3 Aafia Siddiqui
4 Abd al Aziz al Umari
5 عبد العزيز العمري
6 Abderahman Mustafa
7 Abderrahmane Al Maghribi
8 Abdul Baqi
9 Abdul Baqi
10 Abdul Bari
11 Abdul Ghafar Qurishi
12 Abdul Ghafar Shenwary
13 Abdul Ghafoor
14 Abdul Haiy Aazem
15 Abdul Hakim Monib
16 Abdul Hakim Mujahid
17 Abdul Jabbar
18 Abdul Jalil
19 Abdul Kabir
20 Abdul Latif Mansur
21 Abdul Majid
22 Abdul Manan
23 Abdul Qadeer
24 Abdul Rahman Agha
25 Abdul Rahman Ahmad Hottak
26 Abdul Rahman Zahed
27 Abdul Raqib Takhari
28 Abdul Rauf
29 Abdul Razaq
30 Abdul Razaq
31 Abdul Salam Zaeef
32 Abdul Salam Zaeef
33 Abdul Salam Zaief
34 Abdul Samad Khaksar
35 Abdul Satar Paktis
36 Abdul Wahab
37 Abdul Wakil Mutawakil
38 Abdul Wasay Aghajan Motasem
39 Abdulaziz al Omari
40 Abdulhai Motmaen
41 Abdulhai Salek
42 Abdul-Haq Wasseq
43 Abdullah al Fak asi al Ghamdior
44 Abdullah al Fak'asi al Ghamdior

45 Abdullah al Fakasi al Ghamdior
46 Abdullah al Fakasi al Ghamdior
47 Abdullah Murad
48 Abdulrahman Abdullah al Ghamdi
49 Abu Abdallah Abd Al Hakim
50 Abu Abdallah Abd AlHakim
51
52 Abu Abdallah Abd Al-Hakim
53 Abu al Hasan
54 Abu Amjed
55 Abu Anas
56 Abu Anas al Saudi
57 Abu Dhabi Banihammad Ahmed Fayezi
58
59 Abu Fatima
60 Abu Hafs
61 Abu Hafs al Kabir
62 Abu Hafs al Masri
63 Abu Hammam
64 Abu Hassan al Madani
65 Abu Hassan al Sudani
66 Abu Horan
67 Abu Khadijah
68 Abu Khallifah al Omani
69 Abu Mahdi
70 Abu Rida al Sufi
71 Abu Rida the Syrian
72 Abu Ridha al Suri
73 Abu Sitta
74 Abu Ubaydah
75 Abu Yassir al Jaza iri
76 Abu Yassir al Jaza'iri
77 Abu Yassir al Jazairi
78 Abu Yassir al Jazáiri
79 Abu Yassir Sarrir
80 Addallah al Mihdhar
81 Ahmad al Haznawi
82 Ahmad bin Abdullah al Nami
83
84 Ahmad Ibrahim al Haznawi
85
86 Ahmad Jan
87 Ahmad Salat Sa id al Ghamdi
88 Ahmad Salat Sa'id al Ghamdi
أوسامة محمد عوض بن لادن
فائز راشد احمد حسن القاضي بنى حمث
أحمد بن عبد الله النامي
أحمد ابراهيم الحزناوي

89 Ahmad Salat Said al Ghamdi
90 Ahmad Salat Sáid al Ghamdi
91 احمد صلاة سعيد الغامدي
92 Ahmed al Ghamdi
93 Ahmed al Nami
94 Ahmed bin Abdullah al Nami
95 Ahmed Ibrahim al Haznawi
96 Ahmed Jan Akhund
97 Ahmed Nur Ali Jumale
98 Ahmed Salah Said al Ghamdi
99 Akhtar Mohammad
100 Akhtar Mohammad Mansour
101 Al Barakaat Bank of Somalia
102 Al Barakah Exchange
103 Al Hijrah Construction and Development Ltd
104 Al Hijrah Construction and Development Ltd
105 Al Hijrah Construction and Development, Ltd.
106 al Mukh
107 خالد شيخ محمد
108 Al Qaqa
109 Al Qudarat Transport Company
110 Al Timar al Mubarikah
111 Ali Abdul Aziz Ali
112 Ali Haroun
113 Ali Salah Muhammad Kahlah al Marri
114 Alla Dad Tayeb
115 Aminullah Amin
116 Amir Khan Motaqi
117 Amir Khan Muttaqi
118 Ammar al Baluchi
119 Anwar al Aulaqi
120 Anwar al Awlaki
121 Anwar al Awlaqi
122 Anwar alAulaqi
123 Anwar al-Aulaqi
124 Anwar alAwlaki
125 Anwar al-Awlaki
126 Anwar alAwlaqi
127 Anwar al-Awlaqi
128 Anwar Nasser Abdulla Al Aulaqi
129 Anwar Nasser Abdulla AlAulaqi
130 Anwar Nasser Abdulla Al-Aulaqi
131 Anwar Nasser Abdulla Aulaqi
132 أنور ناصر عبدالله العولقي

133 Anwar Nasser Abdullah Aulaqi
134 Anwar Nasser Aulaqi
135 Arefullah Aref
136 Arsalan Rahmani
137 Ashraf Refaat Nabith Henin
138 Atiqullah
139 Attiqullah Akhund
140 Awad al Sayad
141 Awag al Sayyid Atta
142 Azizirahman
143 Banihammad Fayez Abu Dhabi Banihammad
144 Baradar
145 Ben Laden Osama
146 Ben Laden Ossama
147 Ben Laden Usama
148 Bin Laden Osama Mohamed Awdh
149 Bin Laden Usamah Bin Muhammad
150 Bin Ladin International
151 Blessed Fruits Company
152 Dadullah Akhund
153 Djallalouddine Haqani
154 Dost Mohammad
155 Ehsanullah
156 Esmatullah Asem
157 Ezatullah
158 Fahd Bin Adballah bin Khalid
159 Fahrem Shahin
160 Faiz
161 Faiz Mohammad Faizan
162 Faiz Rashid Ahmad Hassan al Qadi
163 Fayaz Rashid Ahmad Hassan al Qadi Bani Hammad
164 Fayez Ahmad
165 Fayez Banihammad
166 Fayez Rashid Ahmed
167 Fayez Rashid Ahmed Hassan al Qadi Banihammad
168 Fazel M. Mazloom
169 Gul Ahmad Hakimi
170 Gum Arabic Company
171 Habibullah Fauzi
172 Habibullah Reshad
173 Hamdullah
174 Hamidullah
175 Hamidullah Nomani
176 Hamsudin

177 Hamza al Ghamdi
178 Hamza Alghamdi
179 حمزة الغامدي
180 Hani Fawaz TRDNG
181 عمار البلوشية
182 Hani (Fawaz TRDNG)
183 Hani Fawaz TRDNG
184 Hani Hanjour
185 Hani Saleh Hasan Hanjour
186 Hani Salih Hasan Hanjur
187 هاني صالح حسن حنجور
188 Hashem Abderahman
189 Hashem Abdollahi
190 Hashem Abdulrahman
191 Hashim Abd al Rahman
192 Hashim Abdourahman
193 Hidayatullah Abu Turab
194 Isam Mansar
195 Isam Mansour
196 Isam Mansur
197 Jalaluddine Shinwari
198 Jan Mohammad Madani
199 Janan
200 Khair Mohammad Khairkhwah
201 Khalid Abdul Wadood
202 Khalid al Mihdhar
203 Khalid bin Muhammad
204 Khalid Mohammad al Saqaf
205 Khalid Muhammad Abdallah al Mihdhar
206 خالد المحضر
207 Khalid Shaikh Mohammed
208 Khalid Sheikh Mohammed
209 Khallad bin Attash
210 M. Ahmadi
211 M. Eshaq
212 M. Hasan Rahmani
213 M. Ibrahim Omari
214 M. Jawaz Waziri
215 M. Musa Hottak
216 M. Rasul
217 M. Shafiq
218 Majad Masha an Muqad
219 ماجد مشعان موقف
220 Majed Mashaan Ghanem Moqed

221 Majed Moqed
222 Majid Moqid Mushan bin Ghanim
223 Manan Nyazi
224 Marwan al Shehhi
225 Marwan Yousef Mohamed Rashid Lekrab al Shehhi
226 Marwan Yusuf Muhammad Rashid Lekrab ash Shehhi

227 مروان يوسف محمد رشيد لكراب الشحي

228 Matiullah

229 Meer Akram

230 Mehan Atta

231 Mohald al Shehri

232 مهند الشهري

233 Mohamed Abbattay

234 Mohamed Atta

235 Mohamed el Amir

236 محمد محمد الأمير عوض السيد عطا

237 Mohamed el Amir Awad el Sayed Atta

238 Mohamed el Sayed

239 Mohamed Elsayed

240 Mohamed Loay Bayazid

241 Mohamed Mohamed el Amir Awad el Sayed Atta

242 Mohammad Abbas Akhund

243 Mohammad Aleem Noorani

244 Mohammad Azam Elmi

245 Mohammad Daud

246 Mohammad el Amir

247 Mohammad Essa Akhund

248 Mohammad Hassan

249 Mohammad Homayoon

250 Mohammad Naim

251 Mohammad Nasim Hanafi

252 Mohammad Rabbani

253 Mohammad Saddiq

254 Mohammad Salim Haqqani

255 Mohammad Sarwar Siddiqmal

256 Mohammad Sediq Akhundzada

257 Mohammad Sharif

258 Mohammad Sohail Shaheen

259 Mohammad Tahre Anwari

260 Mohammad Wali

261 Mohammad Yaqoub

262 Mohammad Zahid

263 Mohammadullah Mati

264 Mohammed al Shehhi
265 Mohammed Atef
266 ابو حفص المصرى
267 Mohammed Loay Baizid
268 Mohammed Omar
269 Mohammed Yassir al Masri
270 Mohand al Shehri
271 Mohand Muhammed Fayiz al Shehri
272 Moslim Haqqani
273 Mounir el Motassadeq
274 Mounir el Moutassadeq
275 منير المتصدق
276 Muhammad Adnan
277 Muhammad Ahanad
278 Muhammad al Amir
279 Muhammad Atta
280 Muhammad Islam
281 Muhammad Muhammad al Amir Awad as Sayyid Atta

282 Muhand ash Shehr
283 Mukhtar al Baluchi
284 Mustafa Ahmed
285 مصطفى الهاوساوي
286 Mustafa Ahmed al Hawsawi
287 Mustafa Ahmed al Hisawi
288 Mustafa Ahmed Muhammad Uthman Abu al Yazid
289 Mustafa Muhammed Ahmed
290 Mustasaed
291 Najibullah
292 Najibullah Haqqani
293 Nawaf al Hamzi
294 Nawaf al Hazmi
295 نواف الحازمي
296 Nawaf Muhammed Salim al Hazmi
297 Nazar Mohammad
298 Nazirullah Anafi
299 Nik Mohammad
300 Noor Jalal
301 Noor Mohammad Saqib
302 Nooruddin Turabi
303 Nurullah Nuri
304 Osama Bin Laden
305 Osama bin Ladin
306 Osama bin Muhammad bin Awad bin Ladin

307 Qalamuddin
308 Qalamudin Momand
309 Qari Abdul Wali
310 Qari Ahmadulla
311 Qari Din Mohammad
312 Qari Din Mohammad Hanif
313 Qudratullah Jamal
314 Rahamatullah Kakazada
315 Rahimullah Zurmati
316 Rahmatullah Safi
317 Ramatullah Wahidyar
318 Ramzi Bin Al Shibh
319 Ramzi Mohamed Abdullah Binalsheidah
320 Ramzi Mohammed Abdellah Omar
321 رمزي بن الشيبة
322 Ramzi Mohammed Abdullah Binalshibh
323 Rasid Ahmed Hassen Alqadi
324 Rostam Nuristani
325 S. Ahmed Shahidkhel
326 Sa id al Ghamdi
327 Sa‘id al Ghamdi
328 Sadruddin
329 Sadudin Sayed
330 Saed M. Azim Agha
331 Saeed Abdallah Ali Sulayman al Ghamdi
332 Saeed Ahmad Lootah
333 Saeed al Ghamdi
334 Saeed al Masri
335 Said al Ghamdi
336 Sáid al Ghamdi
337 سعيد الغامدي
338 Said Bahaji
339 سعيد باهاج
340 Said Madani Al Tayyib
341 Saiduddine Sayyed
342 Salam al Hazmi
343 سالم الحازمي
344 Saleh Saeed Mohammed bin Yousaf
345 Salem al Hamzi
346 Salem al Hazmi
347 Salem Ali
348 Samiullah Muazen
349 Sanani

350 Sannan al Makki

351 Satam al Suqami

352 Satam as Suqami

353 سطام السقامي

354 Satam Muhammed Abdel Rahman al Suqami

355 Sayed Esmatullah Asem

356 Sayeedur Rahman Haqani

357 Sayyed Ghiassouddine Agha

358 Sayyed Haqqan

359 Shafiqullah Mohammadi

360 Shahabuddin Delawar

361 Shams Ur-Rahman

362 Shamsalah Kmalzada

363 Shams-Us-Safa Aminzai

364 Sharif al Din Ali Mukhtar

365 Shaykh Sa id

366 Shaykh Sa'id

367 Shaykh Said

368 Shaykh Sáid

369 Shaykh Usama Bin Ladin

370 Sheikh Said al Masri

371 Sheikh Taysir Abdullah

372 Sher Abbas Stanekzai

373 Syed Allamuddin

374 Taba Investment Company Ltd

375 Taba Investment Company Ltd

376 Taba Investment Company, Ltd.

377 Tahis

378 Tawana

379 Tawfiq Muhammad Salih bin Rashid

380 Ubaidullah Akhund

381 Umar Muhammad Abdallah Ba Amar

382 Usama Bin Laden

383 Usama bin Ladin

384 Usama bin Muhammad bin Awad bin Ladin

385 Usama Bin Muhammed Bin Awad

386 Usama Muhammed Awad Bin Laden

387 Usamah Bin Muhammad Bin Ladin

388 Wa el Hamza Jelaidan

389 Wa'el Hamza Jelaidan

390 Wadi al Aqiq Company Ltd

391 Wadi al Aqiq Company Ltd

392 Wadi al Aqiq Company, Ltd.

393 Wael Hamza Jelaidan

394 Wáel Hamza Jelaidan
395 Wail al Shehri
396 Wail ash Shehri
397 وائل الشهري
398 Wail Mohammed al Shehri
399 Waleed al Shehri
400 Waleed Mohammed al Shehri
401 Walid ash Shehri
402 ولید الشهري
403 Walid Bin Attash
404 Walid Muhammad Salih bin Attash
405 Walid Muhammad Salih bin Roshayed bin Attash
406 ولید محمد صالح بن رشید بن عطاش
407 Walijan
408 Yar Mohammad Rahimi
409 Zabihullah Hamidi
410 Zakariya Essabar
411 زکریا الصبار
412 Zakarya Essabar
413 Ziad Jarrah
414 Ziad Jarrah Jarrat
415 Ziad Jarrahi
416 Ziad Samir al Jarrah
417 Ziad Samir Jarrah
418 Zia-Ur-Rahman Madani
419 Ziyad Samir Garrah
420 Ziyad Samir Jarrah
421 زیاد سمیر جراح
422 Zouheir Al Maghribi